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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Seaway Navigation Limited, Marshall Islands and
Valles Steamship (Canada), Inc.

Plaintiffs,

- against -

Orsasea Tasimicilik ve Ticaret A.S.

Defendant.

08 Civ. 7328(AKH)

**DECLARATION PURSUANT
LOCAL ADMIRALTY RULE
B.1**

1. I am an attorney at law admitted to practice before this Court and I am a member of the firm of Cichanowicz Callan Keane Vengrow & Textor, LLP, attorneys for plaintiffs in the within matter.

2. I make this declaration on personal knowledge in support of plaintiffs' application for issuance of process of maritime attachment and garnishment pursuant to Supplemental Admiralty Rule B(1) with respect to defendant.

3. To my knowledge, and on information and belief, defendant cannot be found within this district.

(a) On August 19, 2008, I caused a search to be made of the records of the New York Secretary of State and found that no corporation with the name of the defendant is incorporated in or registered to do business in New York State.

(b) On August 19, 2008, I caused an inquiry to be made with Verizon Nationwide 411 to determine if any business in defendant's name is listed in its business directory for the area codes encompassing the counties which comprise the Southern District of New York: Bronx, Dutchess, New York, Orange, Putnam, Rockland, Sullivan and Westchester, and Verizon advised that there is no such listing.

(c) Also on August 19, 2008, I caused searches to be conducted on the internet's Google search engine for defendant and could find no information about such company being located in New York State or having a person or party in this state or this district authorized to receive service of process on its behalf.

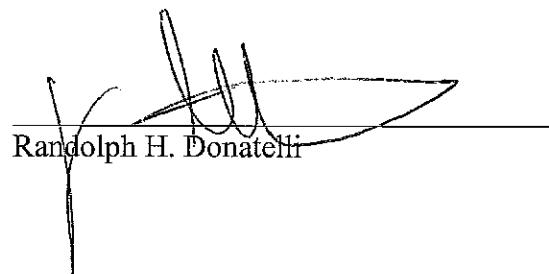
4. As a result of the foregoing, I certify that I have made a diligent search to ascertain the name and address of a person or party upon whom process could be served in this district for defendant, but can find no such person or party.

5. This is plaintiffs' first request for this relief made to this court with respect to defendants.

WHEREFORE, plaintiffs ask that process of maritime attachment and garnishment issue, as requested, against defendant's tangible or intangible personal property in this district in the hands of garnishees to be named in the process.

I declare under penalty of perjury that the foregoing is true and correct.

Executed at New York, New York on August 19, 2008.



A handwritten signature in black ink, appearing to read "Randolph H. Donatelli", is written over a horizontal line. The signature is fluid and cursive, with a prominent 'R' at the beginning.